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6 Attorney for  
Linda Livolsi

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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 LINDA LIVOLSI,  
15 Defendant.  
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Case No. 2:10-cr-00578-APG-GWF

**EMERGENCY MOTION TO EXTEND**  
**SELF SURRENDER DATE**

(Expedited Treatment Requested)

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18 COMES NOW Rene L. Valladares, Federal Public Defender, and Monique  
19 Kirtley, Assistant Federal Public Defender, counsel for LINDA LIVOLSI, files this Motion to  
20 Extend Ms. Livolsi's self-surrender date for the following reasons:

21 1. In granting Ms. Livolsi's third request for an extension to her self-surrender date,  
22 this Court ordered the government to file a brief explaining whether the Bureau of Prisons has  
23 sufficient medical staff and facilities to quickly assess and address Ms. Livolsi's health  
24 conditions when she self-surrenders. The government was ordered to file their brief by noon  
25 on Monday, November 9, 2015. *See* CR #232. As of today's date, November 10, 2015, the  
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1 government has failed to file their brief. Ms. Livolsi is scheduled to self-surrender by noon on  
2 November 13, 2015.

3 2. Ms. Livolsi now requests another extension of her self-surrender date until the  
4 government has filed their brief which this Court ordered on October 29, 2015.

5 3. This is the fourth request to extend the self-surrender date.

6 Respectfully submitted, this 10<sup>th</sup> day of November, 2015

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8 RENE L. VALLADARES  
9 Federal Public Defender

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11 By: /s/Monique Kirtley

12 MONIQUE KIRTLEY  
13 Assistant Federal Public Defender  
14 Attorney for LINDA LIVOLSI  
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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on November 10, 2015, she served an electronic copy of the above and foregoing **EMERGENCY MOTION TO EXTEND SELF SURRENDER DATE** (Expedited Treatment Requested) by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN  
United States Attorney  
J. GREGORY DAMM  
Assistant United States Attorney  
333 Las Vegas Blvd. So. 5th Floor  
Las Vegas, NV 89101

/s/Nancy Vasquez, Legal Assistant  
Employee of the Federal Public Defender